



Certified Mail - Return Receipt Requested

October 7, 1991

Mr. Hank Ellison  
Remedial Project Manager  
U.S. Environmental Protection Agency, 5HS-11  
230 South Dearborn Street  
Chicago, Illinois 60604

Re: Butterworth Landfill Site  
Grand Rapids, Michigan

Dear Mr. Ellison:

This letter will respond to your request for information regarding the Butterworth Landfill Site in Grandville, Michigan. Initially, we must observe that the request is overly broad and seeks information that may be subject to claims of confidentiality and privilege, as well as information that is beyond the scope of EPA's authority. Wolverine World Wide ("Wolverine") hereby objects to all such requests. Moreover, Wolverine has no information that would in any way connect it with the disposal of waste materials at the Butterworth Landfill during the years 1967 through 1973. Although we have requested from you your evidence of this connection, we have not yet received it.

Subject to these objections, and without waiving them, Wolverine wishes to provide answers to EPA's questions as best it can. By providing answers to these questions, we do not admit any liability with regard to the Site.

#### RESPONSES

1. The following persons were consulted in preparation of answers to these information requests:

non-responsive [REDACTED], Director of Purchasing

non-responsive [REDACTED], Former Director of Purchasing  
(no longer with Wolverine World Wide)

non-responsive, Former Supervisor of the Manufacturing Units  
non-responsive, Official of Waste Management of Michigan  
non-responsive, Vice President of Corporate Engineering,  
Wolverine World Wide  
non-responsive, Corporate Plant & Facilities Engineer  
non-responsive, Vice President Engineering - Tannery

2. No documents were found which indicated or implied that any waste was sent to the Site or was handled by any of the contractors listed in question 8a for the years 1967 through 1973.

3. No additional people available to respond.

4. EPA identification nos. were not in use until approximately 1984. Present nos. are:

- a) Tannery - MIT 270012925
- b) Factory A - MID 006015069
- c) Sole Plant - MID 980825988

5. There were no acts or omissions by any person that we are aware of.

6. Persons contacted same as question no. 1.

7. Yes.

- a) Liquid solvents and thinners and some adhesives.
- b) Various solvent and adhesive distributors.

c) Adhesives used in the manufacture of shoes. Empty adhesive drums were returned to the supplier. Solvents used as thinners for adhesives and for machine cleaning. Waste solvents and thinners from the tannery were generally incinerated. Spartan Chemical transported and disposed of the remaining waste solvents and thinners.

d) From time to time during the relevant period. Specific dates unknown.

e) Used in tannery and in shoe factories. See also the answer to 7c.

- f) Unknown.

8. Persons who may have arranged for the disposal of waste materials during the relevant time period cannot be identified. Wolverine does not believe that it ever sent any waste materials to the Site for disposal or treatment. The answers below relate to the only waste for which we believe there is any possibility to have been sent to the Site, i.e. trash.

a) The persons or companies with whom disposal arrangements were made during the relevant period cannot be determined. Wolverine has no records of dealings with the companies identified in the request.

b) Do not have written documents. Trash was picked up on a regular basis.

c) Trash consisting of dry materials such as paper, corrugated, and wood pallets. Corrugated was generated from suppliers of materials as was wood pallets. Office paper and general trash was generated from the offices and factories.

d) Wolverine owned the waste materials until disposed.

e) Do not have this information.

f) No tests were required for trash.

g) Unknown. There is no indication of anyone selecting Butterworth Landfill as a site for disposal of the Wolverine waste. It is more likely that the trash was sent to one or more of the several landfill sites then operating in northern Kent County which were closer to our facilities.

h) Unknown. Records of invoices were not kept going back to 1974.

i) Unknown.

j) Trash was collected on Wolverine property and placed in a compactor in what would be considered a transfer station.

k) Unknown. There is no indication that Wolverine waste materials were ever taken to the Site.

l) Unknown.

m) Unknown.

n) Trash was removed and transported in compactor containers, but there is no indication that trash was ever deposited at the Site.

- o) Unknown, as invoices are no longer available.
- p) No documents available.
- q) Persons in question 1.

9. Manufacturer of shoes and boots and tanning of leather. Shoe manufacturing machines (sewing machines, lasting machines) (tanning machines, drums).

Complete answers to the remaining questions would invoke extensive time and effort, particularly since the information requested concerns operations of nearly twenty-five years ago. Since we have no indication in our records or the memories of any of our past or present personnel that we have ever sent any wastes to the Site, at this time we respectfully decline to provide an extensive catalogue of information unrelated to the Site. If the US E.P.A. can provide some information which would direct our efforts to areas that might prove fruitful we would be willing to respond further.

I HEREBY CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

WOLVERINE WORLD WIDE

By non-responsive  
non-responsive C.P.E.  
Vice President, Corporate  
Engineering

STATE OF MICHIGAN     )  
                                  ) ss.  
COUNTY OF KENT     )

Subscribed and sworn before  
me on October 7<sup>th</sup>, 1991

Beth Dickinson

Notary Public, Kent County, MI  
My commission expires: January 3, 1994

KAREN\REGULATO\BUTTERWO.ELL

BETH DICKINSON  
Notary Public, Kent County, MI  
My Commission Expires Jan. 3, 1994